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GOODLEAP LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHUCK ROWLETT,

Plaintiff,

v.

GOODLEAP, LLC; DOE DEFENDANTS I
THROUGH X; AND ROE CORPORATIONS
I THROUGH X,

Defendants.

Case No. 2:24-cv-01524-MDC

Hon. Miranda M. Du

**STIPULATION AND REQUEST FOR
ORDER EXTENDING TIME FOR
DEFENDANT GOODLEAP, LLC TO
RESPOND TO PLAINTIFF CHUCK
ROWLETT'S COMPLAINT**

[FIRST REQUEST]

Complaint Filed: July 26, 2024

Defendant GOODLEAP, LLC, ("GoodLeap") and Plaintiff CHUCK ROWLETT ("Plaintiff"), by and through their respective attorneys of record, stipulate and agree to extend the deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF No. 1-3 (state complaint)] to September 10, 2024. This is the Parties first request to extend the deadline to respond to the Complaint.

1. On July 26, 2024, Plaintiff CHUCK ROWLETT ("Plaintiff") filed this action in the Eighth Judicial District in Clark County, State of Nevada, entitled *Rowlett v. GoodLeap, LLC*, which was assigned case number A-24-898447-C.

2. The Summons and the Complaint were served upon GoodLeap, LLC's registered agent on July 31, 2024.

3. On August 20, 2024, GoodLeap removed the action from the Eighth Judicial

District Court to this Court, contending this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, as GoodLeap contends the Complaint alleges a federal claim under the Truth-in-Lending Act (15 U.S.C. § 1631, *et seq.*). As a result, pursuant to Federal Rule of Civil Procedure 81(c)(2), GoodLeap's current deadline to file a responsive pleading is August 27, 2024.

4. On August 26, 2024, GoodLeap requested Plaintiff to extend the deadline to respond to the Complaint to September 10, 2024. Part of the reason GoodLeap requested the extension was to discuss the allegations contained in Plaintiff's Complaint and to determine if early resolution is possible. That same day, Plaintiff agreed to the requested extension.

5. Accordingly, the Parties stipulate to extend the deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF No. 1-3 (state complaint)] to September 10, 2024. This stipulation is being submitted in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated: August 27, 2024

ROPERS MAJESKI PC

By: /s/ Timothy J. Lepore
 TIMOTHY J. LEPORE
 Attorneys for Defendant
 GOODLEAP LLC

Dated: August 27, 2024

LAW OFFICES OF MILES N. CLARK, LLC

By: /s/ Chuck Rowlett
 CHUCK ROWLETT
 Attorneys for Plaintiff
 CHUCK ROWLETT

IT IS SO ORDERED this 30th day of August, 2024


 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that on August 27, 2024, I served the foregoing **STIPULATION AND REQUEST FOR ORDER EXTENDING TIME FOR DEFENDANT GOODLEAP, LLC TO RESPOND TO PLAINTIFF CHUCK ROWLETT'S COMPLAINT** to be filed via the Court's CM/ECF system, which will accomplish service on all parties of record through their counsel.

/s/ Stephanie Hart
Stephanie Hart